

Exhibit “C”

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Attorneys for Plaintiff
OAKSTONE LAW GROUP, PC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OAKSTONE LAW GROUP, PC,

Plaintiff,

v.

MARICH BEIN, LLC,

Defendant.

Case No.: 2:23-cv-1463-JWH-ADS

DECLARATION OF DONGLIANG
JIANG IN SUPPORT OF
SUPPLEMENT TO PLAINTIFF'S *EX*
PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND REQUEST FOR OSC
RE: PRELIMINARY INJUNCTION

Complaint Filed: February 27, 2023
Pretrial Conf.: TBD
Trial: TBD

1 I, DONGLIANG JIANG, declare:

2 1. My name is Dongliang Jiang. I am over 18-years-old, have never been
3 convicted of a felony, am of sound mind, competent, and authorized to make this
4 Declaration, the statements of which are within my personal knowledge, true, and
5 correct.

6 2. I am chief financial officer of Oakstone Law Group, PC ("Oakstone" or
7 "Plaintiff"), Plaintiff in the above-captioned action. I respectfully submit this
8 Declaration in support of the Supplement to Plaintiff's *Ex Parte* Application for
9 Temporary Restraining Order and Request for OSC re: Preliminary Injunction
10 ("Application") against Defendant Marich Bein, LLC ("Marich Bein" or
11 "Defendant"). I have read Plaintiff's Supplement in the above-entitled cause. The
12 facts stated therein are within my personal knowledge and are true and correct, based
13 upon my position with Oakstone, my review of the business records of Oakstone,
14 and/or my interviews of persons with knowledge within Oakstone.

15 3. Since Oakstone filed its Application in this Lawsuit, Oakstone continues
16 to receive complaints from customers being double charged by Marich Bein under
17 the assumed name "LPG 949-229-6262." Attached hereto as **Exhibit C-1** are true
18 and correct copies of examples of several client complaints about unauthorized
19 withdrawals. Marich Bein's charges have caused clients to be "double charged."
20 Because we do not want to cause further harm to consumers (because Oakstone is a
21 consumer protection law firm), Oakstone has had to stop charging client accounts.
22 Marich Bein's unauthorized charges continue being processed today and Marich
23 Bein has indicated it refuses to stop unless enjoined. Because we have not been able
24 to charge our customers (or have issued refunds for double charges), Oakstone
25 terminated more than a dozen employees last week.

26 4. Attached hereto as **Exhibit C-2** is a public record Oakstone pulled from
27 the California Secretary of State showing Marich Bein is using the d/b/a "LPG 949-
28 229-6262."

1 5. Included in **Exhibit D** to the Supplement are true and correct copies of
2 multiple Litigation Service Agreements (“LSAs”) executed by and between
3 Oakstone and its clients to provide legal services in exchange for a fee. These
4 Oakstone clients appear on the document sealed with the Court and these clients also
5 submitted affidavits to the Court in support of Oakstone’s Application confirming
6 that Marich Bein is not authorized to debit their accounts.

7 6. In my position as an officer for Oakstone, I am a custodian of records
8 at Oakstone, and, as such, am familiar with the manner in which its records are
9 created and maintained by virtue of my duties and responsibilities. The Records
10 attached hereto as **Exhibit C-1 and the LSAs** (attached to Exhibit D) (the
11 “Records”), respectively, are kept by Oakstone in the regular course of its business.
12 It was the regular course of business of Oakstone for an employee or representative
13 of Oakstone with knowledge of the act, event, condition, or opinion recorded to make
14 the Records or to transmit information thereof to be included in such Records.

15 7. These Records were (1) made as a memorandum or record of an act,
16 transaction, occurrence or event; (2) made at the time of the act, transaction,
17 occurrence or event, or within a reasonable time thereafter; (3) kept in the ordinary
18 course of a regularly conducted business activity; and (4) it was a regular practice of
19 that business to make such a record.

20 8. The Records produced or otherwise created or kept by Oakstone,
21 including myself, are true and correct copies of the originals or exact duplicates of
22 the originals. As custodian of records for Oakstone, I hereby certify that the
23 documents attached hereto as **Exhibit C-1 and the LSAs** reflect true and correct
24 copies of the Records listed above.

25 WHEREFORE, for all these reasons, Oakstone’s motion for a temporary
26 restraining order and preliminary injunction should be granted in its entirety, and
27 Oakstone should be granted such other and further relief as is just and proper.
28

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed on this 6th day of March, 2023.
4

5 
6 DONGLIANG JIANG
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Exhibit “C-1”

Transfer from [REDACTED]
Transfer to Share Draft

\$251.17

MAR 2, 2023

\$0.00

LPG 949-229-[REDACTED] - DIRECT /
PAY : ACH Withdrawal

-\$251.17

MAR 2, 2023

-\$251.17

12:58

Make a
transfer

Pending



CASH APP*WENDY

-\$75.00

BUCKMON TRACER:

[REDACTED]



THECUT INC* [REDACTED]

-\$18.65

TRACER:

[REDACTED]

Activity

ACH Withdrawal COMPANY:

-\$340.98

LPG 949-229- [REDACTED] ENTRY:

\$2,706.05

DIRECT PAY [REDACTED]

Mar 03, 2023

Online banking Deposit

\$2,164.00

Transfer from S0000

\$3,047.03

Mar 03, 2023

Transfer

Debit Card purchase STARBUCKS

-\$8.77

STORE 62163 5814

\$883.03

ORANGEBURG SC

Mar 03, 2023

Food & Dining

Debit Card purchase CASH

-\$5.00

APP* [REDACTED]

\$891.80

PREAUTHORIZED DEBIT
PROG CASUALTY INS PREM

-\$256.49
\$564.22

PREAUTHORIZED DEBIT
OLGPC WEBPAYMENT

-\$477.20
\$820.71

PREAUTHORIZED DEBIT
LPG 949-229- [REDACTED] DIRECT PAY

-\$477.20
\$1,297.91

9:44 



[< Back](#)

Transaction Details



-\$224.39

Direct Pay

[Edit](#)

Posted Friday, **March 3, 2023**



Uncategorized



Appears on your statement as

LPG 949-229- [REDACTED] DIRECT PAY

***** [REDACTED]

Transaction Type

DIRECT PAY

Additional Details

ACH WITHDRAWAL

[Dispute Transaction](#)



Home



Search



Chat

Pending

- POS Debit - Visa Check Card [REDACTED] -
DENVER MUSEUM
ADM/SHOPDENVER COUS

- \$27.19
- POS Debit - Visa Check Card [REDACTED] -
Amazon Prime
Amzn.com/billWAUS

- \$7.61

Mar 3

- ACH Transaction - LPG 949-229-[REDACTED]
DIRECT PAY

- \$172.06
- ACH Transaction - OLGPC
WEBPAYMENT

- \$172.06
- Transfer From Shares

\$300.00

Mar 2

- ACH Transaction - ALLSTATE INS CO
INS PREM

- \$215.44
- POS Debit - [REDACTED]
GATEWAY CONVENI
DENVER COUS

- \$55.75

10:08



Sign off

Transaction details

\$336.71

Transaction: 03/02/2023

Received for processing ⓘ

Additional info

Transaction description

LPG 949-229- [REDACTED] DIRECT PAY 030123

[REDACTED]



Available Balance



Activity

Details

Lpg



Friday, Mar 03

Withdrawal ACH LPG 949-229- TYPE: -\$132.15
DIRECT PAY ID: CO: LPG 949-
229- Entry Class Code: PPD \$4,095.57

Friday, Feb 17

Withdrawal ACH LPG 949-229- TYPE: -\$132.15
DIRECT PAY ID: 1016207445 CO: LPG 949-
229- Entry Class Code: PPD \$660.37

Friday, Feb 03

Withdrawal ACH LPG 949-229- TYPE: -\$132.15
DIRECT PAY ID: 1016207445 CO: LPG 949-
229- Entry Class Code: PPD \$926.95

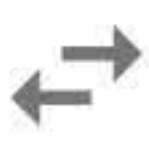
Friday, Jan 20

Withdrawal ACH LPG 949-229- TYPE: -\$132.15
DIRECT PAY ID: 1016207445 CO: LPG 949-
229- Entry Class Code: PPD \$586.26

Friday, Jan 06



Accounts



Transfer



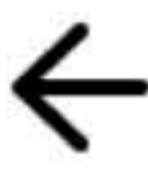
Pay



Deposit



Menu



Transaction Details

-\$241.83
DEBIT

Description DEBIT ELECTRONIC DEBIT
LPG 949-229- DIRECT
PAY

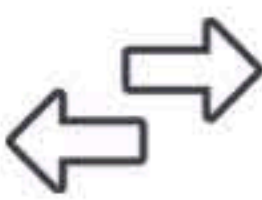
Date 03/03/23

Status Processing

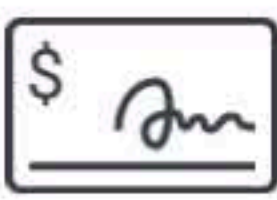
Account ANY DEPOSIT CHECKING



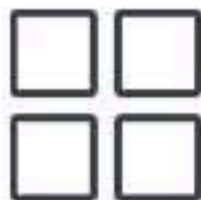
Accounts



Payments



Deposits



More

1:23

5G% 



Transaction Info




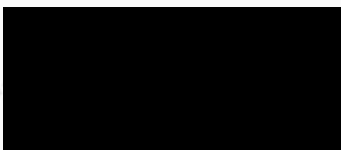
Amount

-\$172.72

Running balance: \$340.37

Account GET GREEN CHECKING S:80
\$340.37

Date Mar 3, 2023

Description Withdrawal LPG 949-229- 
TYPE: DIRECT PAY CO: LPG
949-229- 

LPG 949-229- [REDACTED] DIRECT PAY AC... \$129.48

Pending

Mar 3, Checking

1355

OLGPC WEBPAYMENT ACH ENTRY... \$129.48

Pending

Mar 3, Checking

1355

2:37

5G 61



Sign off

EVERYDAY CHECKING ..

\$732.35

Available balance ⓘ

Overview

Manage account

Routing & details

Recent transactions ⓘ

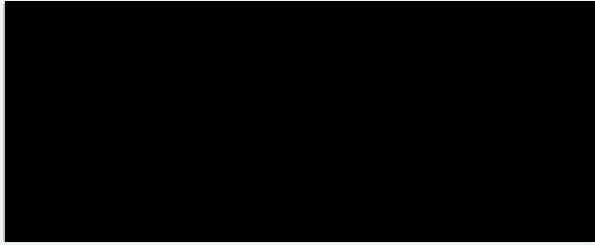
	Pending LPG 949-229- DIRECT PAY 030223	\$324.82
	Pending OLGPC WEBPAYMENT	\$324.82
	Pending	+\$1,836.90
	03/02/2023	\$20.00
	03/02/2023	+\$1,400.00

9:16

5G



TOTAL CHECKING



All transactions

Spending summary



Search or filter

Pending (10)

[REDACTED]

--

-\$84.99

[REDACTED]

--

-\$47.00

ORIG CO NAME: LPG 949-229- [REDACTED] CO ENTRY
DESCR: DIRECT PAY SEC: PPD ORIG ID: [REDACTED]

--

-\$132.33

ORIG CO NAME: OLGPC CO ENTRY DESCR: WEBPAYMENT
SEC: WEB IND ID: ORIG ID: [REDACTED]

--

-\$132.33

POS DEBIT CLASSIC HYUNDAI SERVICE MENTOR OH

--

-\$249.44

POS DEBIT CHIPOTLE 3500 PAINESVILLE OH

--

-\$37.45

POS DEBIT 365 MARKET [REDACTED] TROY MI

--

-\$7.42

POS DEBIT 365 MARKET [REDACTED] TROY MI

-\$3.84

<

TOTAL CHECKING

Account details

Available balance	<div></div>	\$6,537.50
Present balance	<div></div>	\$6,537.50

Show details

Recent transactions

ORIG CO NAME:	LPG 949-229-		CO ENTRY
DESCR:	DIRECT PAY SEC:	PPD ORIG ID:	
Pending			
--			-\$311.50

ORIG CO NAME:	OLGPC		CO ENTRY
DESCR:	WEBPAYMENT SEC:	WEB IND ID:	
Pending			
--			-\$311.50

Pending			
--			\$952.00

See all transactions

Credit Journey

Sign up for your free credit score and more





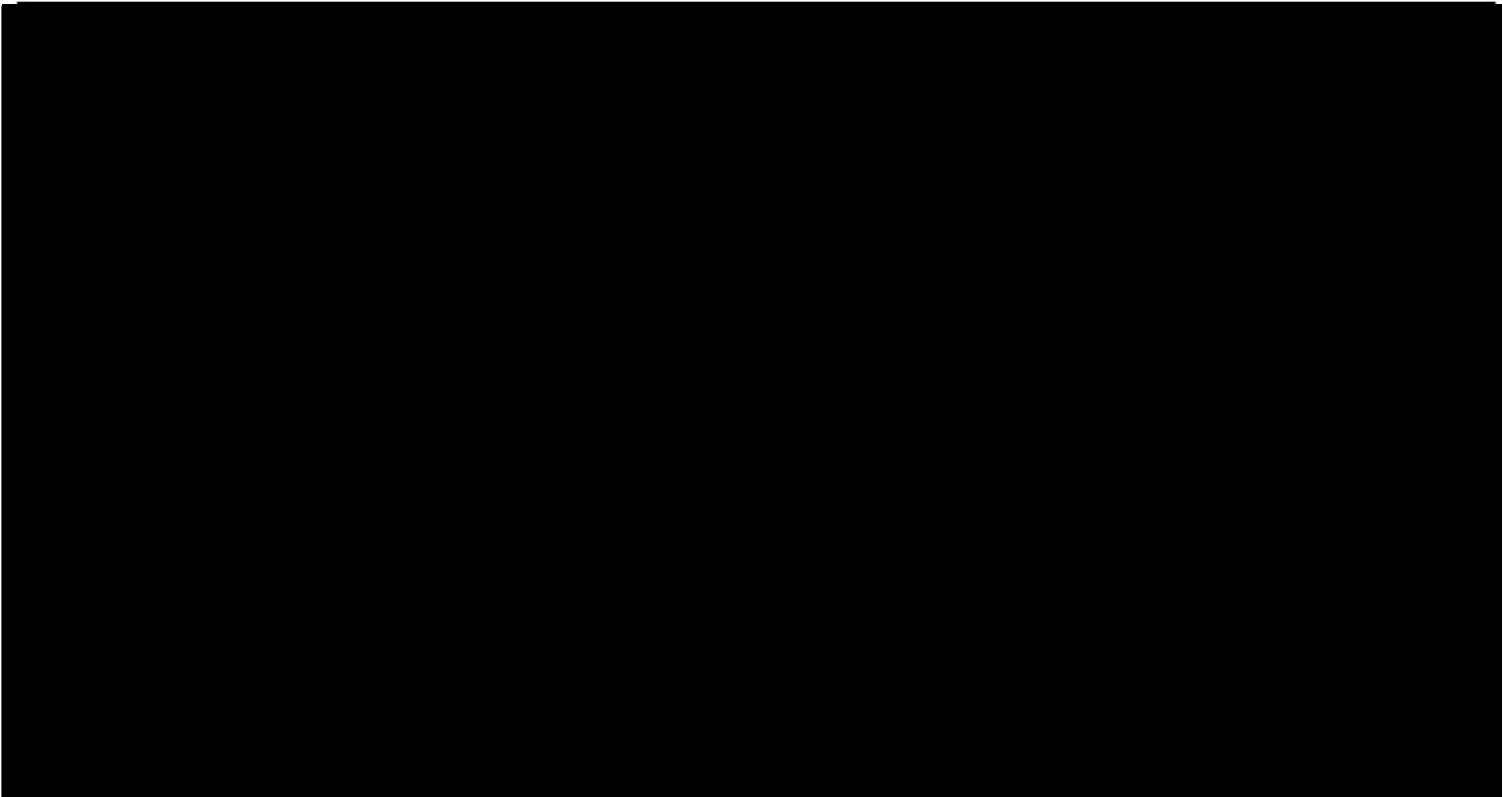
Account Name	[REDACTED]
Today's Beginning Balance	\$1,625.62
Pending Transactions	-\$201.43
Deposit Holds	\$0.00
<hr/>	
Account Balance	\$1,424.19

Account Number	[REDACTED]
Routing Number	[REDACTED]
Account Nickname	[REDACTED]
Account Type	Asterisk-Free Checking
Interest Earned But Not Paid	\$0.00
Year-to-Date Interest	\$0.00
Previous Year Interest	\$0.00

Transaction History

Transactions from 02/01/23 through 03/03/23

Date	Description	Type	Amount	Balance
[REDACTED]				
03/02/2023	LPG 949-229- [REDACTED] DIRECT PAY	Electronic Debit	-\$229.38	\$1,992.29



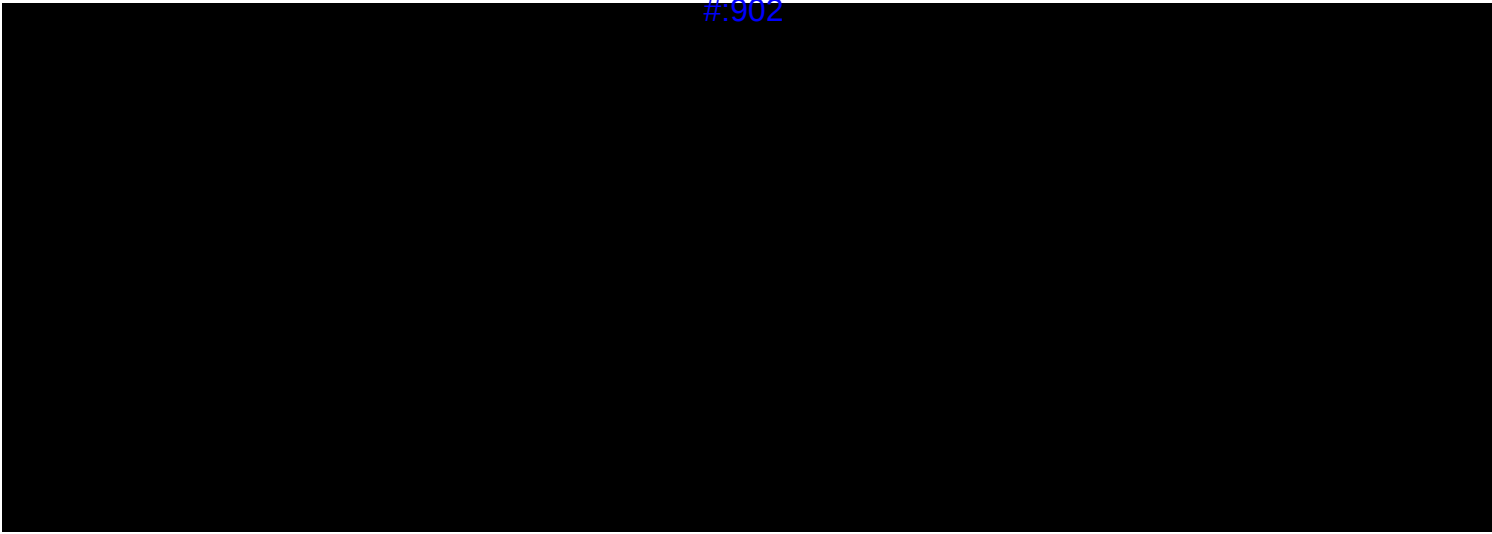
02/21/2023
PAY

LPG 949-229- DIRECT

Electronic Debit

-\$229.38

\$1,090.04




02/02/2023	LPG 949-229- [REDACTED] DIRECT	Electronic Debit	-\$229.38	\$2,106.23
PAY				




[VIEW A REPORT >](#)

[EDIT TRANSACTIONS >](#)

1 - 42

 [Tour the Page](#)


Good morning, [REDACTED]
Last login Mar 2, 2023 09:03 a.m.

 Get student checking that's top of the class. [Start here](#)

Checking & Savings

Total	[REDACTED]
FREE CHECKING	[REDACTED]

FREE CHECKING

[Transfer](#) [Bill Pay](#) [Statements](#) [Account details](#) 

Pending Transactions

[REDACTED]

03/02/2023

LPG 949-22

- \$162.99

[REDACTED]

Posted Transactions

[REDACTED]

03/03/23

LPG 949-229-

DIRECT PAY 030223

#:904

\$107.14



Transaction det...

ACH LPG 949-... 3/2/2023



Add notes



Add images



Attach to a conversat...

Financial Plus Credit Union
- [REDACTED] ELITE CHEC

WITHDRAWAL ACH
LPG 949-229-[REDACTED]

TYPE: DIRECT PAY ID:

[REDACTED] CO: LPG

949-229-[REDACTED] ENTRY

CLASS CODE: PPD

ACH TRACE NUMBER:

[REDACTED]





Current Balance	\$31.96
Available Balance	-\$269.47
YTD Interest Paid	N/A
Interest Paid Last Year	N/A

Recent Transactions

+ Search Options

MALCO DESOTO CIN DC AUTH NS

-\$7.47
Pending

LPG 949-229-

-\$293.96
Pending
Balance -\$262.00

MALCO DES 7130 MALCO SOUTHAVEN MS

-\$13.91
Posted Feb 28

PETCO 1601 SOUTHAVEN MS

-\$5.34
Posted Feb 28

ALLY ALLY PAYMT

-\$632.74
Posted Feb 28

ATMOS ENERGY 888-286-6700 TXA

-\$274.29

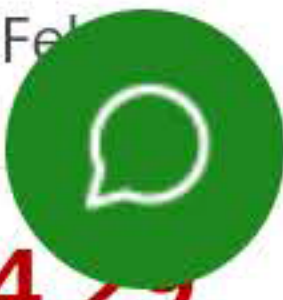


Exhibit “C-2”

Department of State
Division of Corporations

Entity Assumed Name History

[Return to Results](#)

[Return to Search](#)

Entity Details

ENTITY NAME: MARICH BEIN LLC

FOREIGN LEGAL NAME:

ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY

SECTION OF LAW: LIMITED LIABILITY COMPANY LAW - 203 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW

DATE OF INITIAL DOS FILING: 08/18/2022

EFFECTIVE DATE INITIAL FILING: 08/18/2022

FOREIGN FORMATION DATE:

COUNTY: ALBANY

JURISDICTION: NEW YORK, UNITED STATES

DOS ID: 6565998

FICTITIOUS NAME:

DURATION DATE/LATEST DATE OF DISSOLUTION:

ENTITY STATUS: ACTIVE

REASON FOR STATUS:

INACTIVE DATE:

STATEMENT STATUS: CURRENT

NEXT STATEMENT DUE DATE: 08/31/2024

NFP CATEGORY:

[ENTITY DISPLAY](#)

[NAME HISTORY](#)

[FILING HISTORY](#)

[MERGER HISTORY](#)

[ASSUMED NAME HISTORY](#)

Search

File Date	Assumed Name	Assumed Name ID	Status	Principal Location
02/01/2023	CENTER POINTE 215-664- [REDACTED]	6720492	Active	
09/30/2022	GALLANT 215-804- [REDACTED]	6606747	Active	
08/19/2022	LPG 949-229- [REDACTED]	6566985	Active	

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